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Attorneys for Debtor and Debtor in Possession

IN THE UNITED STATES BANKRUPTCY COURT  
DISTRICT OF OREGON

In re	)	Case No. 23-32366-pcm11
	)	
Local 8, International Longshoremen's and	)	NOTICE OF MOTION TO APPROVE
Warehousemen's Union,	)	COMPROMISE AND SETTLEMENT
	)	BETWEEN DEBTOR AND ICTSI OREGON,
Debtor.	)	INC.
	)	
	)	AND
	)	
	)	NOTICE OF HEARING
	)	

NOTICE OF MOTION

On March 15, 2024, Debtor filed its *MOTION TO APPROVE COMPROMISE AND SETTLEMENT BETWEEN DEBTOR AND ICTSI OREGON, INC* [Dkt. No. 94] (the "Motion").

If you oppose the proposed course of action or relief sought in the motion, you must file a written objection with the bankruptcy court no later than 21 days after the date listed in the certificate of service attached hereto. Your objection must set forth the specific grounds for objection and your relation to the case. The objection must be received by the Clerk of Court at U.S. Bankruptcy Court, 1050 S.W. Sixth Avenue, Suite 700, Portland, Oregon 97204 by the deadline specified above or it may not be considered. You must also serve the objection on Susan S. Ford, Sussman

Page 1 of 2 – NOTICE OF HEARING

1 Shank, LLP, 1000 SW Broadway, Suite 1400, Portland, Oregon 97205 within that same time.

2 **NOTICE OF HEARING**

3 YOU ARE NOTIFIED that a **TELEPHONE HEARING** will be held on April 10, 2024,  
4 at 10:00 a.m. before The Honorable Peter C. McKittrick regarding (1) *DEBTOR'S MOTION TO*  
5 *APPROVE COMPROMISE AND SETTLEMENT BETWEEN DEBTOR AND ICTSI OREGON,*  
6 *INC. [ECF No. 94], and (2) DEBTOR'S MOTION TO DISMISS CASE AND FOP RELATED*  
7 *RELIEF [ECF No. 95].*

8 Call in information is as follows:

9 Toll Free Call in Number (888) 684-8852

10 Access Code: 123824

11 Further information to participate at the telephone hearing is in the link below:

12 <https://www.orb.uscourts.gov/judges-telephone-hearing-information>  
13

14 DATED this 19th day of March, 2024.

15 SUSSMAN SHANK LLP

16 By /s/ Susan S. Ford

17 Susan S. Ford, OSB No. 842203  
18 Thomas W. Stilley OSB No. 883167  
19 Joshua G. Flood, OSB No. 223085  
20 Proposed Attorneys for Debtor

21 26933-002 (04442771)  
22  
23  
24  
25  
26

1 CERTIFICATE OF SERVICE

2 I, Janine E. Hume declare as follows:

3 I am employed in the County of Multnomah, state of Oregon; I am over the age of eighteen  
4 years and am not a party to this action; my business address is 1000 SW Broadway, Suite 1400,  
5 Portland, Oregon 97205-3089, in said county and state.

6 I certify that on March 19, 2024, I served, **via first class mail**, a full and correct copy of  
7 the foregoing **DEBTOR'S NOTICE OF MOTION TO SETTLE AND COMPROMISE, AND**  
8 **NOTICE OF HEARING THEREON**, to the parties of record, addressed as follows and on the  
9 parties on the attached matrix:

10 Barnard Iglitzin & Lavitt LLP  
11 18 West Mercer Street, Suite 400  
Seattle, WA 98119

12 Ori Katz  
13 Four Embarcadero Center, 17th Floor  
San Francisco, CA 94111-4109

14 James G Murphy  
15 3803 136th St. N.E.  
Marysville, WA 98271

16 Jennifer Nassiri  
17 1901 Avenue of the Stars, Suite 1600  
Los Angeles, CA 90067-6055

18 Peterson & Associates PS  
19 14201 NE 20th Ave. Suite B-101  
Vancouver, WA 98686

20 I also certify that on March 19, 2024, I served the above-referenced document(s) on all  
21 ECF participants as indicated on the Court's Cm/ECF system.

22 I swear under penalty of perjury that the foregoing is true and correct to the best of my  
23 knowledge, information, and belief.

24 Dated: March 19, 2024.

25 */s/ Janine E. Hume*

26 \_\_\_\_\_  
Janine E. Hume, Legal Assistant

Label Matrix for local noticing  
0979-3  
Case 23-32366-pcm11  
District of Oregon  
Portland  
Fri Mar 15 10:43:40 PDT 2024

AT&T  
PO Box 6463  
Carol Stream, IL 60197-6463

Arrow Sanitary Service  
PO Box 7428  
Pasadena, CA 91109-7428

Barnard Iglitzin & Lavitt LLP  
18 West Mercer Street, Suite 400  
Seattle, WA 98119-3971

(p)CITY OF PORTLAND  
OFFICE OF CITY ATTORNEY  
RM 430  
1221 SW 4TH AVE  
PORTLAND OR 97204-1991

Coast Longshore Division  
1188 Franklin Street  
San Francisco, CA 94109-6800

Comcast Cable  
PO Box 34744  
Seattle, WA 98124-1744

First Choice Coffee Service  
313 SE Yamhill  
Portland, OR 97214-2199

GoToMyPC  
851 W Cypress Creek Rd  
Fort Lauderdale, FL 33309-2009

ICTSI Oregon, Inc.  
1211 SW 5th Ave, Suite 1900  
Portland, OR 97204-3719

ABC Fire Extinguisher Inc.  
4848 NE 102nd Avenue  
Portland, OR 97220-3340

American Bankers Insurance  
Company - Flood Insurance  
PO Box 731178  
Dallas, TX 75373-1178

Arrow Sanitary Service  
PO Box 74280  
Pasadena, CA 91109-7428

Basic Fire Protection Inc.  
8135 NE MLK Blvd.  
Portland, OR 97211-1339

City of Portland  
Police Alarm  
PO Box 5599  
Portland, OR 97228-5599

Columbia River Pensioners  
Memorial Assoc  
2435 NW Front Avenue  
Portland, OR 97209-1825

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San Francisco, CA 94109-6800

IRS  
PO Box 7346  
Philadelphia PA 19101-7346

ALSCO  
PO Box 17337  
Portland, OR 97217-0337

American Bankers Insurance  
Company  
PO Box 731178  
Dallas, TX 75373-1178

Ash Grove Cement Company  
Attn: Plant Manager  
13939 N Rivergate Blvd  
Portland, OR 97203-6608

Centric Elevator Corporation  
2855 SE 9th Avenue  
Portland, OR 97202-2508

Clark County, Washington  
Attn: Human Resources  
PO Box 5000  
Vancouver, WA 98666-5000

Comcast Business  
PO Box 376091  
Philadelphia, PA 19101-0601

SUSAN S FORD  
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Schwabe, Williamson & Wyatt  
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I.L.W.U.  
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San Francisco, CA 94109-6800

International Raw Materials, L  
600 Chestnut St Ste 800  
Philadelphia, PA 19106-3413

Intuit PO Box 34328 Seattle, WA 98124-1328	Johnson Controls Security System PO Box 371967 Pittsburg, PA 15250-7967	Johnson Controls Security System PO Box 371967 Pittsburgh, PA 15250-7967
ORI KATZ Four Embarcadero Center, 17th Floor San Francisco, CA 94111-4109	DANIEL KUBITZ Schwabe, Williamson & Wyatt PC 1211 SW 5th Ave Ste #1900 Portland, OR 97204-3719	Lifeready 360 3597 E Monarch Sky Ln #200 Meridian, ID 83646-1055
Local 11 Health Funds PO Box 515199 Los Angeles, CA 90051-5199	Local 8, International Longshoremen's a 2435 NW Front Ave Portland, OR 97209-1825	MC Landscaping LLC 12065 SW Gault Beaverton, OR 97008-7936
Michael Garone Schwabe, Williamson & Wyatt PC 1211 SW 5th Ave. Portland, OR 97204-3795	Michael T. Garone Schwabe Williamson & Wyatt, PC 1211 SW 5th Avenue Portland, OR 97204-3795	Amy E Mitchell POB 2289 Lake Oswego, OR 97035-0074
James G Murphy 3803 136th St. N.E. Marysville, WA 98271-7816	N.W. Natural Gas 250 SW Taylor St. Portland, OR 97204-3038	JENNIFER NASSIRI 1901 Avenue of the Stars, Suite 1600 Los Angeles, CA 90067-6055
Norhtwest Industrial Business Association 1125 Madison Suite 112 Portland, OR 97214-3600	OPEIU Local 11 3815 Columbia Street Vancouver, WA 98660-1967	Oregon Area District Council 2435 NW Front Avenue Portland, OR 97209-1825
Oregon Department of Revenue Box 14800 Salem, OR 97309-0920	Oregon Mutual Group PO Box 3900 Portland, OR 97208-3900	Pacific Maritime Association EE Welfare PO Box 45322 San Francisco, CA 94145-0322
Pacific Maritime Association Pay Directs PO Box 740849 Los Angeles, CA 90074-0849	Pavelcomm 1640 NW 14th Avenue Portland, OR 97209-2502	Pavelcomm, Inc. 1640 N.W. 14th Ave Portland, OR 97209-2502
Peterson & Associates PS 14201 NE 20th Ave. Suite B-101 Vancouver, WA 98686-6412	Peterson & Associates PS 7917 NE Hazel Dell Ave Vancouver, WA 98665-8226	Portand Joint Labor Relations Committee 555 Market Street, 3rd Floor San Francisco, CA 94105-5801
Portland General Electric 7895 SW Mohawk St Tualatin OR 97062-9192	Portland General Electric PO Box 4438 Portland, OR 97208-4438	Portland Police Alarm Administration PO Box 1867 Portland, OR 97207-1867

LAWRENCE R REAM  
Schwabe, Williamson & Wyatt P.C.  
1420 Fifth Avenue  
Ste 3400  
Seattle, WA 98101-2339

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PO Box 78829  
Phoenix, AZ 85062-8829

SAIF Corporation  
400 High St  
Salem, OR 97312-1000

SAIF Corporation  
400 High Street ST  
Salem, OR 97312-1000

THOMAS W STILLEY  
1000 SW BROADWAY #1400  
PORTLAND, OR 97205-3066

Servicemaster  
PO Box 1213  
Clackamas, OR 97015-1213

Sierra Springs  
PO Box 660579  
Dallas, TX 75266-0579

Sprague  
PO Box 2222  
Tacoma, WA 98401-2222

Stat Pads LLC  
13897 W. Wainwright  
Boise, ID 83713-5011

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2002 156TH AVENUE NE, #201  
Bellevue, WA 98007-3828

CHRISTIAN A. TORIMINO  
DOJ-Ust  
1220 SW 3rd Ave.  
Room 315  
Portland, OR 97204-2829

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Multnomah County  
PO Box 2716  
Portland, OR 97208-2716

Trotter & Morton Facility  
29755 SW Boones Ferry Road  
Wilsonville, OR 97070-7202

Trotter & Morton Facility  
Service  
29755 SW Boons Ferry Road  
Wilsonville, OR 97070-7202

US Bank Equipment Finance  
PO Box 790448  
Saint Louis, MO 63179-0448

US Trustee, Portland  
1220 SW 3rd Ave., Rm. 315  
Portland, OR 97204-2829

Unions-America  
PO Box 100  
Battleground, WA 98604-0100

Unions-America.com  
PO Box 3101  
Clackamas, OR 97015-3101

United States Treasury  
PO Box 932100  
Louisville, KY 40293-2100

Western States OPEIU  
Pension Fund, PMB #116  
5331 S. Macadam Avenue, Ste 258  
Portland, OR 97239-3871

Western States OPEIU Pension  
Fund  
Unit 10, PO Box 4800  
Portland, OR 97208-4800

Western States OPEIU Pension  
c/o BeneSys, Inc. PMB116  
5331 SW Macadam Ave. Ste. 258  
Portland, OR 97239-3871

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

City of Portland  
PO Box 4216  
Portland, OR 97208

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)ICTSI Oregon, Inc.

End of Label Matrix	
Mailable recipients	81
Bypassed recipients	1
Total	82